STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD

DOCKET NO. 4994

CITY OF EAST PROVIDENCE MOTION TO INTERVENE

NOW COMES the City of East Providence ("COEP"), and pursuant to Rule 1.14 of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission ("Commission"), moves that the Commission grant the COEP's right to intervene as a party in the above-captioned Docket for the reasons set forth herein:

- The COEP owns and operates its own water distribution system which serves all residents, businesses, and other entities within the City.
- 2. The COEP purchases 100% of its water supply from the Providence Water Supply Board.
- 4. The increase sought by the Providence Water Supply Board represents a substantial increase in the wholesale price of water the COEP purchases from Providence.
- 5. Any increase in Providence's wholesale water rate will result in increased water rates for the COEP's customers.
- 6. The COEP has a significant interest that will be directly affected by the Commission's review and decision in this matter.
- 7. This interest is not adequately represented or protected by the existing parties in this Docket.
 - 8. In addition, the COEP's participation in this Docket is in the public interest.

WHEREFORE, the City of East Providence requests that the Commission grant its Motion to Intervene and that it be granted status as a party in this proceeding, and that the Commission grant all other relief it deems meet and just.

CITY OF EAST PROVIDENCE

By its attorney,

Michael J. Marcello, (ity Solicitor (#5221)

City of East Providence

145 Taunton Avenue East Providence, RI 02914

Telephone: (401) 435-7523

mmarcello@cityofeastprov.com

Dated: January 29, 2020

CERTIFICATION

I hereby certify that on January 29, 2020, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

Parties	E-mail	Phone
Providence Water Supply Board (PWSB)	Michael@McElroyLawOffice.com;	401-351-4100
Michael McElroy, Esq.	Leah@McElroyLawOffice.com;	
McElroy & Donaldson		
PO Box 6721		As a commission of the commiss
Providence, RI 02940-6721		
Ricky Caruolo, General Mgr.	RickyC@provwater.com;	401-521-6300
Providence Water Supply Board	Greggg@provwater.com;	_
552 Academy Avenue Providence, RI 02908	Marydw@provwater.com;	
	NancyP@provwater.com;	
	PeterP@provwater.com;	
	STEVEC@provwater.com;	_
	ALICIAM@provwater.com;	
Harold Smith	Hsmith@raftelis.com;	704-373-1199
Raftelis Financial Consulting, PA		es proprieta de la companya de la co
1031 S. Caldwell Street, Suite 100		
Charlotte, NC 28203		
Division of Public Utilities (Division)	Leo.wold@dpuc.ri.gov;	401-780-2177
Leo Wold, Esq.	john.bell@dpuc.ri.gov;	
Division of Public Utilities and Carriers	Pat.smith@dpuc.ri.gov;	
John Bell, Chief Accountant	Hakeem.ottun@dpuc.ri.gov;	
	Robert.Bailey@dpuc.ri.gov;	
	MFolcarelli@riag.ri.gov;	
	Dmacrae@riag.ri.gov;	
Jerome Mierzwa	jmierzwa@exeterassociates.com;	410-992-7500
Exeter Associates, Inc.		
10480 Little Patuxent Pkwy, Suite 300		
Columbia, MD 21044		
Ralph Smith	rsmithla@aol.com;	734-522-3420
Larkin & Associates, PLLC	dawn.bisdorf@gmail.com;	
15728 Farmington Road	ssdady@gmail.com;	
Livonia, Michigan 48154	mcranston29@gmail.com;	

Joseph A. Keough, Jr., Esquire KEOUGH & SWEENEY, LTD. 41 Mendon Avenue Pawtucket, RI 02861	jkeoughjr@keoughsweeney.com	(401) 724-3600
File original and nine (9) copies w/: Luly E. Massaro, Commission Clerk Margaret Hogan, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov; Margaret.Hogan@puc.ri.gov; Cynthia.wilsonfrias@puc.ri.gov; Margaret.hogan@puc.ri.gov; Sharon.colbycamara@puc.ri.gov; Alan.nault@puc.ri.gov;	401-780-2107
Kathleen Crawley Water Resources Board	Kathleen.crawley@wrb.ri.gov;	401-222-6696

Michael J. Marcello, City Solicitor (#5221)

City of East Providence 145 Taunton Avenue

East Providence, RI 02914 , Telephone: (401) 435-7523

Fax: (401) 438-1719

mmarcello@cityofeastprov.com